

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ANTHONY TRUPIA,

Plaintiff,

v.

CASE NO. CIV-24-498-SLP

HERITAGE HARD ASSETS LLC; KYLE PATTON, individually as Manager/Officer of HERITAGE HARD ASSETS LLC; HL VENTURES, an unregistered New York company, REAGAN GOLD GROUP, LLC; STEVE FRANCIS, individually as Manager/Officer of REAGAN GOLD GROUP, LLC; WORLD HARVEST CHURCH, INC.; ROD PARSLEY, individually as Manager/Officer of WORLD HARVEST CHURCH, INC.; SOUTH BAY GALLERIES LLC; BRANDON MENDELSON, individually as Manager/Officer of SOUTH BAY GALLERIES LLC; TELNYX LLC; DAVID CASEM, individually as Manager/Officer of TELNYX, LLC; IAN EITHER, individually as Manager/Officer of TELNYX LLC; JAMES WHEDBEE, individually as Manager/Officer of TELNYX LLC; MANDI MENA, individually as Manager/Officer of TELNYX LLC; ONVOY LLC; BRETT SCORZA, individually as Manager/Officer of ONVOY, LLC; JAMES HYNES, individually as Manager/Officer of ONVOY, LLC; G Edwards Evans, individually as Manager/Officer of ONVOY, LLC; MATTHEW CARTER JR, individually as Manager/Officer of ONVOY, LLC; LEVEL 3 COMMUNICATIONS, LLC; JEFF STOREY, individually as Manager/Officer of LEVEL 3 COMMUNICATIONS, LLC; ZEBERSKY PAYNE SHAW LEWENZ, a Florida law firm; ZACHARY D. LUDENS, individually as an attorney of ZEBERSKY PAYNE SHAW LEWENZ; and DOES 1 through 100, inclusive,

Defendants.

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NOTICE OF SPECIAL APPEARANCE¹ ON BEHALF OF CERTAIN DEFENDANTS

COMES NOW, undersigned attorney Zachary D. Ludens of Zebersky Payne Shaw Lewenz, LLP, and hereby files this Notice of Special Appearance on behalf of Heritage Hard Assets LLC; Kyle Patton; Zebersky Payne Shaw Lewenz, LLP; and Zachary D. Ludens (collectively, the “Defendants”). Undersigned counsel requests copies of all documents filed with the Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 20, 2024, I filed the attached documents with the Court’s CM/ECF system and served the attached document by First Class U.S. Mail and email on the following, who are not registered participants of the Electronic Filing System:

Anthony Trupia, 605 SE 21st Street
Oklahoma City, OK 73129
trupiaar@gmail.com

ZEBERSKY PAYNE SHAW LEWENZ LLP

By: /s/ Zachary D. Ludens
Zachary Dean Ludens
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OKWD Federal Bar No. 24-78
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¹ In making this appearance, Defendants Heritage Hard Assets, LLC; Kyle Patton; Zebersky Payne Shaw Lewenz, LLP; and Zachary D. Ludens reserve all defenses, including, but not limited to, objections to the personal jurisdiction of this Court. This reservation applies equally with respect to the forthcoming waiver of service of summons forms.

² Undersigned counsel is in the process of preparing a motion to this Court to seek permission to dispense with the requirement that counsel that are not located in Oklahoma need to engage local counsel under Western District of Oklahoma Local Rule 83.3(c). As the Court can see, Plaintiff sued not only a Florida company and citizen but also that Florida company’s Florida counsel and law firm in this lawsuit.